Circuit of Baltimora City

Hattie Blount, otherwise known as Hattie Blunt,

vs.

Thomas Blount, otherwise known as Thomas Blunt.

BILL OF COMPLAINT.

Mr. Clerk:-

Please file, etc.

Attorney for Complainant.

GEORGE HOFFERBERT

743-753 CALVERT BLOOM

Hattie Blount, otherwise :: known as

In the

Hattie Blunt, ::

Circuit Court of

::

::

Thomas Blount, otherwise :: known as

vs.

Thomas Blunt. ::

Baltimore City.

To the Honorable the Judge of said Court:

Your Oratrix, complaining, says:

- l. That on or about the 23rd day of October, 1912, she was married by a duly ordained Minister of the Gospel in the City of Baltimore, State of Maryland, to Thomas Blount, otherwise known as Thomas Blunt, with whom she resided in said City of Baltimore until about the month of November, 1923.
- 2. That she has been a resident of Baltimore wity, State of Maryland, for more than two years prior to the filing of this bill of complaint.
- That, although the conduct of your Oratrix toward her husband, the said Thomas Blount, otherwise known as Thomas Blunt, has always been kind, affectionate and above reproach, the said Thomas Blount, otherwise known as Thomas Blunt, has without any just cause or reason, abandoned and deserted her and has refused to return and live with her.
- 4. That your Oratrix is without means of support for herself except what she can earn from her own labor.
- 5. That she is informed, and verily believes, that her husband, the said Thomas Blount, otherwise known as Thomas Blunt, is earning or is capable of earning from

fifty to sixty dollars a week.

6. That your Oratrix has received no allowance whatever from the said Thomas Blount, otherwise known as Thomas Blunt, for the support and maintenance of herself since April 18th, 1924;

To the end, therefore:

- (a) That the said Thomas Blount, otherwise known as Thomas Blunt, may be decreed to pay unto your Oratrix a reasonable sum in payment of back alimony and an allowance each week as permanent alimony for her maintenance and support:
- (b) That your Oratrix may be allowed alimony pendente lite as also a reasonable sum as counsel fee for her solicitor of record herein.
- (c) That your Oratrix may have such other and further relief as her case may require.

May it please your Honor to grant unto your Oratrix the writ of subpoens, directed to the said Thomas Blount, otherwise known as Thomas Blunt, residing in Baltimore City, commanding him to be and appear in this Court at some certain day, to be named therein, to answer the premises and abide by and perform such decree as may be passed therein.

And as in duty bound, etc.

Natur Blowt

Complainant.

Solicitor for Jomplainant.

STATE OF MARYLAND, CITY OF BALTIMORE, to wit:

I HEREBY CERTIFY that on this /8 day of
February, in the year nineteen hundred and twenty-five,
before me, the subscriber, a Notary Public of the State
of Maryland, in and for Baltimore dity aforesaid, personally
appeared Hattie Blount, otherwise known as Hattie Blunt,
and made oath in due form of law that the matters and facts
set forth in the foregoing Bill of Complaint are true to
the best of her knowledge and belief.

AS WITNESS my hand and Notarial Seal.

L'Osta Limpson

around Mc Elderry & ...

65 B Docket 147

Hattie Blomst from as

### Order for Alimony

Pendente Lite

ORDER

IN THE

## CIRCUIT COURT

OF

	BALTIMORE CITY
Thomas Blount otherwise	, <u></u>
known as Thomas Blunt.	TERM, 192
ORDERED BY THE COURT this.	25 day of Flely 1925
that the defendant Thomas Bloum	promas thomas Blunt.
pay to the plaintiff that Blount	Therwise Hattre Blunt
the sum of len Dollans	(\$1000).
Dollars per week, during the continuance of this suit,	, accounting from the
day of Self 1925 to t	he said plaintiff Hathe Blunt from en
as alimony, pendente lite unless cause to the contrary	
day of March 192 prov	vided a copy of this Order be served on the said defendant
	pefore the
day of Much 1925	
	Guraet John
•	
TRUE COPY—TEST:	
CLERK	·
CLERK	

The aforegoing Order having been returned "Non Est" as appears by the Sheriff's return thereon; it is Ordered by the Circuit Court of Baltimore City this day of 1925, that the time for showing cause under said Order be extended to the day of 1925, and the time for service of a copy of the same be extended to the day of

IN THE CIRCUIT COURT OF

BALTIMORE CITY, 147

HATTIE BROUNT, otherwise known as HATTIE BLUNT

Vs.

THOMAS BLOUNT, ptherwise known as THOMAS BLUNT

13 28,467

RESPONDENT'S ANSWER

Mr.Clerk:-

Please file.

Davis Tovans
ATTORNEYS FOR RESPONDENT

J. STEWARD DAVIS
ATTORNEY AT LAW

215 SAINT PAUL PLACE

Ed. 41 BALTIMORE. MD. 1925

BAUMGARTE & CO., IN

HATTIE BLOUNT, otherwise known as

IN THE CIRCUIT COURT

nown as HATTIE BLUNT

Vs.

OF

THOMAS BLOUNT, ptherwise known as

THOMAS BLUNT

BALTIMORE CITY.

The answer of your respondent to the petition of the complainant exhibited is as follows:

I. That your respondent admits the allegations as contained in the first paragraph of the bill of complaint.

(2)

That your respondent admits the allegations as contained in the second paragraph of the bill of complaint.

(3)

That your respondent denies with great emphasis that he abandoned the complainant without just cause or reason, but avers that the complainant has committed the crime of adultery with divers, lewd and abandoned men, whose names will be disclosed at the time of the trial of this cause.

(4)

That your respondent denies that the complainant is without any means of support and avers that her income is greater than that of your respondent.

(5)

That your respondent denies that he has any income to the amount of fifty (\$50.00) dollars or sixty (\$60.00) dollars per week or that he can earn any such an amount.

WHEREFORE your respondent prays that the bill be dismissed with costs to the complainant.

ATTORNEYS FOR RESPONDENT

Thomas Sweet
RESPONDENT.

STATE OF MARYLAND, BALTIMORE CITY, to wit:-

I HEREBY CERTIFY, that on this 2nd day of April, in the year one thousand nine hundred and twenty five before me, the subscriber, a Notary Public of the State of Maryland, in and for the City of Baltimore aforesaid, personally appeared Thomas Blount and made oath in due form of law that the matters and facts in the foregoing answer are true to the best of his knowledge and belief.

AS WITNESS my hand and Notarial Seal.

Helen C. Fisher

Seo Hofferbe	at	
·	: /\	Ct. Ct.  No. Docket
		Blomit
		Blount
	=	MOTION FOR HEARING
		R
		B No. 28467
	Fil	ed day of 192 5
Dani LE		

Davis + Evans

Hattie Bloust, otherwise	1
Known as Nathe Blunt	IN THE
Vs.	CIRCUIT COURT
Thomas Blount, otherwise	OF
Known as Thomas Blund	BALTIMORE CITY
The Complainant	by George Noffeebeet
Solicitor, applies to have the	above entitled cause placed on the Trial Calendar
on alimony pendente	lite
	· · · · · · · · · · · · · · · · · · ·
in conformity with the First Equity Rule.	
Solicitor for	George Nofferbus
	George Noffenbul

Serve on

Davis & Evans

Service admittes
Davis + Evans.
April 9, 1925
ACF.

215 at Paul

Ct. Ct.

B-147 1925

No.

Docket

HATTIE BLOUNT, ETC.

s.

THOMAS BLOUNT, ETC.

NOTICE OF HEARING

1 copy

B No. 28467

No. (7)

Filed 6" day of April 1925

1+

Hattie Blount, otherwise known as Hattie Blunt.

IN THE

# Blount Thomas ####, otherwise known as Thomas Blunt.

#### CIRCUIT COURT

OF BALTIMORE CITY

C	Jpon application made by the Solicitor for the Complainant
the a	bove entitled cause has been placed upon the trial calendar in
	rdance with the provisions of the First Equity Rule, and the
same	e will stand for hearing on Alimony Pendente Lite

when reached in due course on said calendar.

CHARLES R. WHITEFORD

Clerk Circuit Court.

Seo. Hofferbert

Serve on

Geo. Hofferberth

Seria admittes for Ses. Molarles. Apr. 5/20-

743 Colvert B

Davis & Evans

**CIRCUIT COURT** 

147 Bls\_Docket No.

Blount vs.

Blount

1 copy

PETITION AND ORDER TO TAKE TESTIMONY UN-DER 30th RULE

Bvo. 28467

Fd. 6 april 1925

147) (19N5

Hattie Blunt
Hattie Blunt
Vs.

Thomas Blount
ofterwise known as
Thagnas Blunt

IN THE

#### Circuit Court

)F

BALTIMORE CITY

To the Honorable the Judge of the Circuit Court of Baltimore City:

The plaintiff in this case respectfully shows unto your Honor:

THAT he desires to examine orally, in open Court and in the presence of your Honor, certain witnesses who can testify to the facts and matters relevant to the allegations in the Bill of Complaint filed in this case.

Your petitioner therefor prays your Honor to pass an order, according to the Statutes for such case made and provided.

And as in duty bound will ever pray.

Solicitor S for Plaintiff. Defendant

Upon the foregoing Petition and Application it is this day of day of	
A. D., 19 25, Ordered that the petitioner have leave to take testimony as prayed and that the	
testimony to be offered be taken as required by the 30th Rule of this court. And it is further Ordered that a copy of this petition and order be served on the Solicitor, on or before the day of All Solicitor	erl

#### CIRCUIT COURT

192 5 B

No.

Docket.

.....

Blunt

Final Order, Counsel Fee and Alimony

Pendente Lite.

B 28467

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Filed To Wful

192 %

Hattie Blount, otherwise Known as Blunt

## CIRCUIT COURT

BALTIMORE CITY.

Thomas Blount, otherwise

January Term, 1925

This cause coming on to be heard upon the petition for Alimony pendente lite and Counsel fee, and the answer thereto, and testimony taken, and having been submitted by the solicitors for the respective parties;

	0 //	
ORDERED by the Circuit Court of Baltimore City this	20	day
April 1925, that the Defen	dant	2
pay to the Plaintiff		
the sum of		
the sum or	Donars, as co	unser ree for
e Solicitor of the	a	nd that he
rther pay the sum of Jive	Dolla	ars per week,
the said Stattie Blound		
Alimony pendente lite accounting from the 21 day of	telmary	192 🗸
d continuing until the day of		
long pending) or until the further order of this Court.	gr AS	Call

Attachment in Equity.

P3.28467

Filed 251 day of April 1318

#### MARYLAND, Sc.

## The State of Maryland.

	T	o the Sheriff of Balt	imore City, Greeting:
			:
You are Hereby Command	ed, that you attach	i the bod y of	
Thomas Blount,	otherwise	Known a	ro
Thomas 13	lunt	1	
if he shall be found in your b	ailiwick, and h	sake keep, so that y	ou have hunbefore
the Judge of the Circuit Court, of	f Baltimore City, at	t the Court house in	n the same city, on
the day of	<b>192 √</b> , to ans	; wer as well touching	g a certain contempt
by hancommitted in not			4
1		1/ 1/	, , , , , , , , , , , , , , , , , , ,
obeying the ore dated april 20,	der of this	Acrocable	r Court
dated april 20.	1925.		
	2		
as well as to such other matters an	d things as shall b	e then and there alle	ged against h
Hereof fail not, as you will a	answer the contrary	zat vour peril	
	•		
Witness The Honorable Jame	<b>s P. Gorter,</b> Chief J	udge of the Suprem	e Bench of Baltimore
در المصطفح الفائد فراد بالكامم بالإرام والمصطف وبالمصطب الروق الرازات	ليجلب أأراط يجالاه والمسيدة المستنبط المستوا	rarch	19 2 1
Issued the 25"	day of	kil	1925
- 1	s R. Whilef		
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Quesche) mithe	~ ~		

Nattre Blown	\
r	
vs.	
Thomas Blownt	
K	

IN THE

## CIRCUIT COURT

OF

BALTIMORE CITY

Ordered by the Circuit Court of Baltimore City this 18 day of June 192 J
that the Defendant Thomas Blouit appear before this Court in person,
on the day of the day
if any he may have, why he should not be punished for contempt of this Honorable Court in not obey-
ing the Order of this Court passed on the 20 day of 4, 1924 directing the
payment of Alimony, pendente lite, by him to the Plantiff Stattic Blown
provided a copy of this Order be served on the said Thomas Blouds
on or before the TO day of Successful 19,
Lengra Lolm
Lewyre! w

·	•
Hattre Blound	IN THE
	CIRCUIT COURT
vs.	
	OF
Thomas Blount	BALTIMORE CITY
Ordered by the Circuit Court of Baltimore Cit	in this 18th July 192
that the Defendant Thomas Bl	appear before this Court in person,  at 10 o'clock A. M., and then and there show cause.
	d for contempt of this Honorable Court in not obey-
	day of , 192, directing the
payment of Alimony, pendente lite, by him to the	Plaintiff, Teathe Blown
provided a copy of this Order be served on the sa	id Thomas Blound
on or before the 31 day of July	, 192V.
	Accord 2 60g
	<i>'</i>

Ct. Ct. Mb.2 Hatti Blom Thomas Blount Final Order, Counsel Fee and Alimony Pendente Lite,

No.  $\frac{28467}{43}$ B.

Filed 6" July 1925

IN THE JIT COURT **OF** BALTIMORE CITY. The petition for Alimony pendente lite and Counsel fee and the answer thereto in the above entitled cause coming on for final hearing and the respective parties having been heard; It is Ordered by the Circuit Court was of Baltimore City this \_\_\_\_\_\_day 19 25, that the defendant Thomas Blown pay to the Plaintiff Hattie Blown Dollars, as Counsel Fee during the continuance of this suit, to the said Nattie Blown payments to be made through the Probation office 1

Ct. Ct.

1975 8.

Docket\_

Blound

Blount

SUMMONS FOR WITNESSES

BNo. 28468

Filed\_\_\_//" day of faw 1976

## IN THE CIRCUIT COURT OF BALTIMORE CITY

				*	Term, 19
1	/	// The Sheriff w	ill please sumr	non the follo	owing witnesses
eturnable <u>ul</u>	sday	law 10	2 - 19	26	at 10 A. M
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to testify for Ha	met				
in the case of		1 Olo	unt		
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	/	1 Olou	nt.	2	
	X		hant	11 6.1.	La D
·			Cle	rk of Circuit Cour	of Baltimore City

Hattie Blount.

In the

VS.

Circuit Court of

::

Thomas Blount.

Baltimore City.

Mr. Clerk: -

Please issue summons for the following

witness:

Mrs. Hattie Blount, 604 N. Eden Street,

to testify for the Plaintiff in the above entitled case and make the same returnable to Tuesday, January 12th, at 10 A. M.

Attorney for Haintier.

147-1975

IN THE CIRCUIT COURT OF

BALTIMORE CITY.

HATTIE BLOUNT, otherwise known as

HATTIE BLUNT

VS.

THOMAS BLOUNT, otherwise known as

THOMAS BLUNT.

B 28467

Mr.Clerk:-

Please file.

Heirs V Evans

ATTORNEYS FOR DEFENDANT

J. STEWARD DAVIS
ATTORNEY AT LAW
215 SAINT PAUL PLACE

BALTIMORE, MD.

Fd 12 Juny 1926

BAUMGARTEN & CO., INC.

HATTIE BLOUNT, otherwise known as

IN THE CIRCUIT COURT

HATTIE BLUNT

**VS.** . :

OF

THOMAS BLOUNT, otherwise known as

THOMAS BLUNT

BALTIMORE CITY

This cause standing ready for hearing and neither of the parties being present,

It is thereupon this I2th day of January, I926 by the Circuit Court of Baltimore City, ordered, adjudged and decreed that the bill of the complainant be and the same is hereby dismissed.

And it is further ordered that the defendant in the said bill of complaint pay the costs of this suit.

Entrank